

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: David D. Douglas
Autumn N. Douglas

Debtor(s)

BK. NO. 20-70304 JAD

JP MORGAN CHASE BANK, NATIONAL
ASSOCIATION

Movant

CHAPTER 13

v.

David D. Douglas
Autumn N. Douglas

Respondents

and

Ronda J. Winnecour, Trustee

Additional Respondents

**RESPONSE MOTION OF JP MORGAN CHASE BANK, NATIONAL
ASSOCIATION
FOR RELIEF FROM THE AUTOMATIC STAY**

Respondent by its Attorney, Willis & Associates., hereby files the following Response to the Motion seeking termination of the Automatic Stay and leave to foreclose on its mortgage on real property owned by Debtor(s).

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Denied Debtor is without sufficient knowledge as to what Movant wishes, by way of further response payment are being made wage attachment via Chapter 13 Trustee.

6. Denied Debtor is without sufficient knowledge as to current payoff.

7. Denied that Debtors are currently delinquent in payments to the Chapter 13 Trustee in the amount of \$1,968.00. Per the trustee network arrears as of 10/31/2020 were \$519.00.
(November payment is not due)

8. Denied Debtor's payments are being made per wage attachment via Chapter 13 Trustee.

9. Denied that Debtors are currently delinquent in payments to the Chapter 13 Trustee in the amount of \$1,968.00. Per the trustee network arrears as of 10/31/2020 were \$519.00.

10. (November payment is not due)

11.

12. Admitted.
13. Admitted.
14. Admitted.
15. Denied by way of further response payment are being made per wage attachment via Chapter 13 Trustee.
16. Denied by way of further response payment are being made wage attachment via Chapter 13 Trustee.
17. Legal conclusion to which no response is required.

WHEREFORE, Respondent respectfully requests that this Court enter an Order Denying the Motion for Relief from the Automatic Stay.

Date: November 6, 2020

/s/ Lawrence Willis, Esquire
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